

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**AASIR AZZARMI,**

**Plaintiff,**

**-against-**

**KEY FOOD STORES CO-OPERATIVE,  
INC., DOES 1-10**

**Defendants.**  
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**Index No. 20-cv-06835**

**ANSWER**

Defendant KEY FOOD STORES CO-OPERATIVE, INC. by its attorneys  
Hoffmann & Associates, for its answer to the complaint herein, aver as follows:

**THE PARTIES**

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1 of the complaint.
2. Admits the allegations set forth in paragraph 2 of the complaint.
3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3 of the complaint.

**JURISDICTION AND VENUE**

4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 4 of the complaint.
5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 5 of the complaint.

**SHORT & PLAIN STATEMENT (RULE 8A)**

6. Denies the allegations set forth in paragraph 6 of the complaint.

**FACTS**

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 7 of the complaint.
8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 8 of the complaint.
9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 9 of the complaint.
10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 10 of the complaint.
11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11 of the complaint.
12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 12 of the complaint.
13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 13 of the complaint.
14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 14 of the complaint.
15. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 15 of the complaint.
16. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16 of the complaint.
17. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 17 of the complaint.

18. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 18 of the complaint.
19. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 19 of the complaint.
20. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 20 of the complaint.
21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 21 of the complaint.
22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 22 of the complaint.
23. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 23 of the complaint.
24. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 24 of the complaint.
25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 25 of the complaint,
26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 26 of the complaint.
27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations set forth in paragraph 27 of the complaint.
28. Denies the allegations set forth in paragraph 28 of the complaint.
29. Denies the allegations set forth in paragraph 29 of the complaint.
30. Denies the allegations set forth in paragraph 30 of the complaint.
31. Denies the allegations set forth in paragraph 31 of the complaint.

**CAUSE OF ACTION**  
**DEFAMATION PER SE (Against All Defendants)**

- 32. Repeats and realleges its responses to the allegations set forth in paragraphs 1-31 of the complaint.
- 33. Denies the allegations set forth in paragraph 33 of the complaint.
- 34. Denies the allegations set forth in paragraph 34 of the complaint.
- 35. Denies the allegations set forth in paragraph 35 of the complaint.
- 36. Denies the allegations set forth in paragraph 36 of the complaint.
- 37. Denies the allegations set forth in paragraph 37 of the complaint.
- 38. Denies the allegations set forth in paragraph 38 of the complaint.
- 39. Denies the allegations set forth in paragraph 39 of the complaint.
- 40. Denies the allegations set forth in paragraph 40 of the complaint.
- 41. Denies the allegations set forth in paragraph 41 of the complaint.
- 42. Denies the allegations set forth in paragraph 42 of the complaint.
- 43. Denies the allegations set forth in paragraph 43 of the complaint.
- 44. Denies the allegations set forth in paragraph 44 of the complaint.
- 45. Denies the allegations set forth in paragraph 45 of the complaint.

**FIRST AFFIRMATIVE DEFENSE**

- 46. Plaintiff's allegations against defendant fails to set forth legally cognizable claims upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**

- 47. Plaintiff's claims are barred by the doctrines of estoppel, laches, waiver, unclean hands, accord and satisfaction and the applicable statutes of limitations.

**WHEREFORE**, defendant Key Food Stores Co-Operative, Inc. demands that the complaint be dismissed in its entirety and that it be awarded the costs, disbursements and reasonable attorneys' fees necessitated by this action and such further relief as the Court shall deem appropriate.

Dated: New York, New York  
January 6, 2021

Respectfully submitted,

**HOFFMANN & ASSOCIATES**

By: /s/Andrew Hoffmann  
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